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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LLOYD and LAWRENCE
KAUFMANN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

J.P. MORGAN CHASE & CO. and CHASE
INVESTMENT SERVICES CORP.,

Defendants.

No. 11 Civ. 9305 (LTS)

KENNETH CIULLO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

J.P. MORGAN CHASE & CO. and CHASE
INVESTMENT SERVICES CORP.,

Defendants.

No. 12 Civ. 2197 (LTS)

**NOTICE OF MOTION FOR CONDITIONAL CERTIFICATION AND COURT-
AUTHORIZED NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) of the FLSA ("Motion for Conditional Certification"), and in the Declaration of Rachel Bien and the exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) granting conditional certification of the proposed collective;
- (2) ordering J.P. Morgan Chase & Co. and Chase Investment Services Corp. ("Chase") to produce a computer-readable data file containing the following for collective members: names, last known mailing addresses, last known telephone numbers, last known email addresses, Social Security numbers, work locations, and dates of employment;
- (3) authorizing the issuance of Plaintiffs' Proposed Notice and Consent to Join form to collective members and one reminder notice during the opt-in period; and
- (4) granting such other, further, or different relief as the Court deems just and proper .

Dated: January 14, 2013
New York, NY

Respectfully submitted,

OUTTEN & GOLDEN LLP

By:

/s/ Rachel Bien

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